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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
# REGION V

**DATE:** May 6, 1991

**SUBJECT:** Record of Conversation with Joe Adams of Warzyn Engineering on the ACS Draft FS.

**FROM:** Robert E. Swale, RPM

**TO:** ACS File

I talked today with Joe Adams of Warzyn Engineering concerning my impression of certain aspects of the draft FS report recently submitted to EPA. I told him that I was surprised that the FS document did not include a concept proposed earlier by him for Alternative 2 which we had discussed. This concept was one in which Alt. 2 would include controlling and dewatering of the on-site groundwater system, and the performance of numerous treatability studies on various technologies during the actual beginning of remediation activities at the site. I stated that if the alternative was worded properly in the FS document (i.e., the PRPs agree to conduct an aggressive series of treatability studies and complete them in a given period of time while simultaneously dewatering the site), that EPA could seriously consider this alternative. EPA would seriously consider this type of alternative, since it is likely that the control of the groundwater portion of the remedy would require at least two years to fully implement (i.e, design and construction and actual dewatering). And would probably require more realistically, three years. This arrangement would work since *all* of the alternatives presented in the FS thus far, except Alts 1&2, require extensive dewatering prior to source area remediation. This type of system may be more likely to facilitate cleanup rather than by picking a single type of technology, simply because if the chosen technology does not work, then another remedial technology will have to be selected and restarted, thus retarding cleanup time. In the conceptual Alt 2. approach, the best performer would be selected which would have the greatest chance of success.

Another issue we discussed involved the optimization of the groundwater pump & treat technology for the "off-site" areas. I stated that the FS needs to include more detail and mention more aggressively that optimization of the G.W.P.T system would be a priority for the off-site areas. The goal of which is to clean up the upper aquifer in the shortest time possible. The FS would, for example, have to state that certain parameters would be examined during design (such as retardation factors, pump tests, recovery curve etc.) and that the best overall system configuration that would optimize the removal rate of

contaminants in the groundwater would be implemented. This type of approach would be similar to the vapor extraction pilot study discussion already included in the FS. Joe agreed with this approach and I told him that we would be including this in our comments.

Joe then asked about how we liked their treatment of the Griffith Landfill issue. I told him that the landfill would have to treated differently in the FS. I stated that preferably the landfill would be treated as an "FS inside of an FS". The landfill should be separated from the rest of the site and a series of alternatives specific to municipal landfills compared. I told him that the guidance recently released on municipal landfills should be used to set up the alternatives. I also told him that based upon my knowledge of the risk and the status of the landfill (i.e., under State solid waste control), that it would be unlikely that EPA would select a Subtitle C cap or very expensive remedy for the landfill. It would be more likely that EPA would select an alternative that would improve upon certain factors already in place at the site such as leachate collection, cap integrity, groundwater monitoring etc.

The final issue concerned what EPA's position would likely be on the present version of Alt 2. Alt 2 would cap and close the site and monitor the groundwater. I told him that this version would not likely be acceptable as a long term remedy since under SARA it did not meet many of the criteria for balancing such as "long term land disposal uncertainty", "reduction of toxicity and mobility to a satisfactory level" "selection of a remedy which favors treatment over containment" etc. I told him that it was very or definitely unlikely that EPA would select such a remedy for this site given the severity of the problem. Joe added that the hydrogeology is very sensitive and that the site upon which some members of the PRP committee are basing their argument in favor of Alt. 2, contains a very thick impermeable shale layer underlying the capped portions of the site. This scenario not existing at the ACS site.

We then concluded the conversation.